From: Bradshaw, Kelly
To: Arcand, Michel
Cc: Ajzerle, Sanda; Chaves, Francisco; Beaudoin, Denis
Subject: Updates - FC - EMA
Date: February 15, 2022 10:58:00 PM

Michel,

Quick recap of the day for FPCO – FC:

- Developed process and partnership with OPP for info sharing with the FIs in relation to EMA.
- Created internal RCMP process through one point of contact at FPCO (Cpl. Kelly Hughes). A/Insp. Chad Babin and A/Staff Sgt. Adrienne Vickery engaged as well on various aspects.
- Created a cover letter to accompany all info sharing lists to the FIs.
- Briefed all Fed Crops on process and way forward (MS Teams call and follow up email). Requested they in turn brief their contract counterparts as necessary (verbal and sharing of email msg).
- OPP will deploy a surveillance team to obtain intel on target vehicles/individuals.
- Created a unit to assess and review intel with the purpose to share with banks (SII).
- Initial briefings with the banks (phone calls, emails).
- Short meeting with FINTRAC to advise of EMA and our approach with FIs. They offered and will be sending RCMP an up-to-date list of all FIs and Credit Unions from their holdings.

- Meeting at 14h with reps from the Financial Institutions.
  Key takeaways:
- RCMP informed the FI's that Emergency Measures Act was imminently going to be signed today.
- Informed that RCMP will provide names of entities as soon as the act in signed off (as early as tonight). Will be tomorrow am after the OPP and FIs 'digest' the EMA now that it's signed and published.
- RCMP will provide a central point of contact that will channel the names of the entities to the FI's.
- The FI's proposed the 'Grid Alert' process, under the Canadian Bankers Association (CBA), as a means to share information to them. Another possibility to share would be direct email communication to their 'Legal Order' inbox. The FI's will discuss among themselves, along with consulting their legal departments, as to what is the best way to channel information to them and inform the RCMP NHQ asap – most likely tomorrow.
- The FI's asked whether the onus of reporting information or acting on EMA obligations relied on them. RCMP reps indicates that the banks have the onus of detecting and freezing assets such they identify client entities. Identification of entities should be done based on the criteria's set on the EMA.
- Regarding the freezing of assets, RCMP reps highlighted that the measures are not about confiscation but rather temporary disruption. To this effect, it was suggested that assets should be frozen as long as the emergency measures are in effect.
- FIs were concerned about scenarios where 'joint accounts' could be frozen, thus impacting

individuals not involved in the protests. FIs indicated they needed more bio info than just names.

- FIs concerned about physical security at their banking locations. Informed to call POJ if they receive threats or have concerns for safety.
- RCMP internal discussions on concerns: Can we change the freezing of assets after initial info sharing if the results of the fronzen assests are having an unintended, negative impact on ops? How – process and authority to do so? Who? Also, if the FIs act on their own when they have concerns about an entity, this could potentially have a neg impact on ops (we are asking the banks to share the action they take with RCMP, siting reporting and operational reasons). The banks do not have a central point of access for a streamlined process with the RCMP. Still waiting on them on who to send the lists to. If no decision is made, RCMP will fan it out to all FIs each time. Not all FIs and/or necessary people were on the call that the banks set up today… some had their security officers and some had their CAMLOs…. This seemed to create added challenges. More meetings will be necessary by the FIs to sort out their internal processes concerning the EMA.

Kelly
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